

@compoundfinance please see the letter and draft complaint for patent infringement at truereturnsystems.com/c-docs.

Regards,

David A. Boag BOAG LAW, PLLC 447 Broadway, Suite 2-270 New York, NY 10013 +1.212.203.6651 dab@boagip.com

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TRUE RETURN SYSTEMS LLC,

Plaintiff,

VS

COMPOUND PROTOCOL,

Defendant.

Case No. [xxx-cv-xxxxx-ABC]

COMPLAINT FOR PATENT INFRINGEMENT

True Return True Return Systems LLC ("True Return"), by and through its undersigned counsel, brings this Complaint for patent infringement against Defendant Compound Protocol ("Compound"), and in support thereof alleges as follows, upon personal knowledge as to itself and upon information and belief as to all others:

NATURE OF THE ACTION

 This action seeks legal and equitable relief against Compound's unlawful infringement of True Returns' United States Patent No. 10,025,797, generally relating to technology for improving computerized ledgers, including distributed computerized ledgers such as blockchains.

PARTIES

- True Return is limited liability company organized and existing under the laws of the state of Connecticut with its principal place of business located at 253 Turtle Back Road, New Canaan, CT 06840.
- Upon information and belief, Compound is a decentralized autonomous organization controlled and operating at the Ethereum blockchain contract address